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1 **LEWIS**
2 **AND**
3 **ROCA**
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5 **LAWYERS**

6
7 **BEFORE THE ARIZONA CORPORATION COMMISSION**

8 **WILLIAM A. MUNDELL**
9 **Chairman**

10 **JAMES M. IRVIN**
11 **Commissioner**

12 **MARC SPITZER**
13 **Commissioner**

Arizona Corporation Commission

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14 **IN THE MATTER OF U S WEST**
15 **COMMUNICATIONS, INC.'S**
16 **COMPLIANCE WITH § 271 OF THE**
17 **TELECOMMUNICATIONS ACT OF 1996**

Docket No. T-00000A-97-0238

18 **COMMENTS OF WORLDCOM, INC. ON REPORT**
19 **ADDRESSING QWEST'S STAND ALONE TEST ENVIRONMENT**

20
21 WorldCom, Inc., on behalf of its regulated subsidiaries, ("WorldCom") submits the
22 following comments on the SATE Summary Evaluation Report ("SATE Report"), Version 2.0,
23 release date of December 3, 2001, prepared by Hewlett-Packard ("HP"). WorldCom has also
24 reviewed AT&T's comments on the SATE Report and concurs in comments and concerns.
25
26

1 **INTRODUCTION**

2 The requirement for a stand-alone test environment for testing of Qwest's operation
3 support systems ("OSS") is found in the overall requirement that Qwest develop an
4 adequate change management plan. In evaluating Qwest's change management plan
5 ("CMP"), Qwest must demonstrate: (1) that information relating to the CMP is clearly
6 organized and readily accessible to competing carriers; (2) that CLECs had substantial
7 input in the design and continued operation of the CMP; (3) that the CMP defines a
8 procedure for the timely resolution of change management disputes; (4) the availability of
9 a stable testing environment that mirrors production; and (5) the efficacy of the
10 documentation that Qwest makes available for the purpose of building an electronic
11 gateway. After determining whether Qwest's CMP is adequate, the FCC will evaluate
12 whether Qwest has demonstrated a pattern of compliance with this plan.¹

13 As stated in the SATE Report, Qwest commissioned HP to evaluate its IMA-EDI
14 Stand Alone Test Environment ("SATE"). HP's primary objective is to provide an
15 evaluation of SATE that is unbiased, factual and representative of the experience that a
16 CLEC would face in using SATE for Interoperability testing to establish an IMA-EDI
17 interface with Qwest. In addition, HP's objective is to determine whether the SATE
18 provides an adequate means of testing and support to CLECs seeking to compete in the
19 Arizona marketplace.

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26 ¹ See, FCC 271 orders, TX Order ¶ 108; Mass. Order ¶ 103; PA Order, App. C, ¶ 42.

Also as noted in the SATE Report, prior to development of the SATE, CLECs in the Arizona local telecommunications market had to rely on Qwest's Interoperability Testing process for production certification and to prepare for new software releases. Interoperability Testing uses production systems. However, it requires that the CLECs use valid account data of live customers for testing purposes, since all transactions are edited against production and legacy systems. This practice is costly, time consuming, and inconvenient for both CLECs and their customers. HP also observed instances in which customer accounts were inadvertently changed. The SATE was developed by Qwest in August of 2001.

Qwest professes that its implementation of SATE will provide the following:

- 1) An end to end test environment
- 2) Meet the requirements of the FCC
- 3) Meet the needs of CLECs

In August 2000, Qwest provided a level of effort assessment against change request #4868276 that was submitted by Eschelon which stated that: *"Qwest is currently in the process of creating an end-to-end test environment. Qwest will revisit this issue when that environment is available."*

The FCC² found that "Bell Atlantic's change management process provides for a stable testing environment."³ Competing carriers need access to a stable testing

² See, Memorandum Opinion and Order", CC Docket 99-295 Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, Section 109

³ A stable testing environment means that no changes by the BOC are permitted after the testing period commences. See generally U S WEST Sept. 27 Letter; NY Attorney General Comments at 17 (describing the importance of testing opportunities for competing carriers).

1 environment to certify that their OSS will be capable of interacting smoothly and
2 effectively with Bell Atlantic's OSS, as modified. In addition, prior to issuing a new
3 software release or upgrade, the BOC must provide a testing environment that mirrors the
4 production environment in order for competing carriers to test the new release. If
5 competing carriers are not given the opportunity to test new releases in a stable
6 environment prior to implementation, they may be unable to process orders accurately and
7 unable to provision new customer services without delays.⁴ KPMG originally found Bell
8 Atlantic's testing environment "Not Satisfied," specifically noting that the testing
9 environment "did not adequately mirror production capabilities."⁵ As the New York
10 Commission suggests, this can result in competing carriers' transactions succeeding in the
11 testing environment but failing in production.⁶

12 SATE was implemented in an effort to meet CLEC needs as was stated by Qwest
13 in its EDI White Paper document issued June 18, 2001, version 1.01. In that paper, Qwest
14 specifically recognized that [CLECs] Co-Providers felt that their market entry was delayed
15 by limitations of the [then] current EDI Interoperability test process and stated:

- 16 • Paper versions of orders must always be sent to Qwest prior to testing. Co-

17 Providers cannot attempt a function and get an immediate response. Therefore,
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24 ⁴ See generally Department of Justice Evaluation at 35 ("testing is necessary to prevent
25 major service disruptions when Bell Atlantic makes changes in its side of the interface").

26 ⁵ KPMG Final Report P1-2 at IV-17 (Test P1-2); New York Commission Comments at
59.

⁶ New York Commission Comments at 59.

1 the learning process can be time consuming, and both Qwest and the Co-
2 Providers must have staff to fully review these paper transactions.

- 3 • Co-Providers must maintain production accounts for testing as real production
4 systems are called upon during testing. Some providers do not have end-user
5 accounts within Qwest's network. Others are hesitant to run tests on their end-
6 user's accounts.
- 7 • Additionally, Interoperability testing has an impact on Qwest's production
8 environment as well, such as the reservation of real telephone numbers and
9 appointments during the testing process.

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13 **B. SPECIFIC COMMENTS**

14 1. Areas for Review

15 As part of the Arizona third party test of Qwest 's OSS, the Psuedo-CLEC was
16 tasked with validating the assertions made by Qwest that implementation of its SATE met
17 FCC requirements and those of CLECs in general. Also, as part of the Arizona third party
18 test was the requirement to impose military style testing or a test until pass philosophy
19 upon the evaluation of SATE.

20 The Psuedo-CLEC approached its evaluation by developing four critical areas for
21 review:

22 Documentation

23 Process

Transaction Testing

CLEC Input

a. Documentation

The documentation reviewed reflected “numerous, relatively minor inaccuracies that HP believes are the result of hasty preparation and poor version control.” The end result was the HP was forced to rely heavily on Qwest to understand the nature of the documents. This process is time consuming for both Qwest and CLECs. What is lacking in this report is conclusive evidence that Qwest addressed these inaccuracies and implemented a version control procedure to address changes in the future.

b. Process

The process review resulted in a recommendation that the “SATE process should be formalized and refined to provide an ease of understanding by CLECs and to ensure consistent repeatability.” What is critical is the need for Qwest to implement such a formalized process that is not evident in this report.

c. Transaction Testing

The transaction testing results reflected “discrepancies related to business rules consistency between the SATE and production systems.” The evidence uncovered reflects that Qwest SATE does not mirror production. Qwest must demonstrate that its SATE mirrors production environment. HP was also unable to verify that a full release testing is available and cannot do so until Qwest’s major IMA 9.0 is released in February 2002. This too is a requirement of the FCC.

1 d. CLEC Input

2 HP discovered that prior to implementation, Qwest had no formalized means of
3 addressing CLEC concerns. WorldCom was only requested to attend formalized SATE
4 users group sessions beginning in early November 2001.
5

6 2. Open Issues

7 Based upon its initial testing, HP found that the accuracy and consistency of SATE
8 test responses was adequate to support certification. At the time of the SATE Report, 91%
9 of SATE Release 7.0 transactions have either passed the initial test or a re-test. The
10 remaining 9% of SATE Release 7.0 transactions will be retested prior to issuance of HP's
11 final report.
12

13 a. Formal Issue HPSATEEV2002: This issue relates to LSR responses in SATE.
14 Qwest has replied as follows: Qwest believes that the incident identified herein is a
15 documentation issue -- not an issue that results in SATE responses different from production
16 responses. Qwest will supply updates to the IMA-EDI Implementation Guide documentation to
17 clarify the language regarding "refine their business process." This update was to be provided on
18 November 9th, 2001. This release of the documentation will be evaluated for the Final Report and
19 HP will provide an updated evaluation.
20

21 b. Formal Issue HPSATEEV1001: This issue is related to SATE connectivity
22 when following the processes for "Establishing a Dedicated Circuit" and "Firewall and IA to IA
23 Test Phase" as described in the Guide. Qwest did make updates to the IMA-EDI Implementation
24 Guide in its November 9, 2001 release of the guide. HP reviewed these updates and
25 recommended that Qwest make further clarifications. The most recent response from Qwest
26

1 indicates that an updated IMA-EDI Implementation Guide will be delivered on November 30,
2 2001 to accommodate the HP recommendations. HP will provide an updated evaluation for the
3 Final Report.

4 c. To help clarify and expedite the Data Request Process in the future,
5 Qwest made changes to both the Data Request Form and the IMA-EDI Implementation
6 Guide in accordance with HP's recommendation. These changes were released to the
7 community on November 9, 2001. HP reviewed these modifications and recommended
8 some minor adjustments. Qwest will provide an updated IMA-EDI Implementation Guide
9 with the appropriate modifications on November 30, 2001. HP will evaluate those
10 additional changes and provide an updated evaluation for the Final Report.

13 d. Add Products/Activities to SATE: The purpose of this evaluation was to
14 ensure that a CLEC could successfully request the addition of a product and associated
15 order activities that are not currently supported by SATE. Additionally, once the product
16 was made available within the SATE the test scenarios provided in the updated Data
17 Document were executed to ensure the expected results of each scenario could be
18 obtained. HP has requested that Qwest add the Unbundled Distribution Loop product to
19 SATE. In the most recent Data Document distribution v7.09 and v8.07 on November 28,
20 2001, Qwest has added the UDL and UDLNP products and their associated test scenarios.
21 HP is in the process of preparing for the evaluation of all of the UDL scenarios for both
22 IMA EDI release 7.0 and 8.0. This evaluation will be completed and presented in the
23 Final Report.
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1 e. Full Regression Testing: The purpose of Full Regression Testing is a
2 quality assurance test based on the multiple changes that HP requested during the
3 aforementioned evaluation methods. HP is executing each scenario supplied in the SATE
4 as documented in the v7.8 and v8.6. The outcome of each transaction will be balanced to
5 the expected result listed in the respective Data Document. All variances will be reported
6 to Qwest. The results of this test will be made available in the Final Report.

8 f. HP will confirm the SATE returns consistent responses (inconclusive
9 result). This has been noted as an "Inconclusive rating" as HP is formalizing the results.
10 HP has noted discrepancies in responses during multiple release testing. HP has results
11 that show the same scenario to produce different outcomes when comparing the results of
12 7.0 to the results of 8.0. HP is currently investigating the extent of this issue. These
13 results will be provided in the Final Report.

16 g. Although HP highlights a number of "unsatisfactory results" in its
17 table 5.6.3, there is no evidence in this report that satisfactory results must be made prior
18 to completion of its evaluation. The results are as follows:

- 20 1) HP will confirm the SATE test data is valid
- 21 2) HP will confirm that the SATE business rules are consistent
22 with the rules published in the Qwest Network Disclosure
23 Document
- 25 3) HP will confirm the results of a scenario in SATE will match
26 that scenario's results in production

These issues are critical and must be resolved to satisfaction prior to the issuance of a final report.

C. CONCLUSION

There are many unresolved issues in this initial report. Because “military style” testing or “test until pass” philosophy is being employed, WorldCom expects that no issue will go unresolved upon issuance of a final report. As well, the critical nature of an end-to-end test environment has been noted by the requirements imposed by the FCC and emphasized by the CLEC community in Qwest territory. CLECs have not only pushed to have a sufficient end-to-end test environment but have jumped on board when called upon to provide industry input. All outstanding issues must be resolved prior to the completion of HPs evaluation.

Finally, Qwest implemented its SATE without meaningful input from CLECs and continues to change the test environment without using the formalized change management process. Since a SATE is a critical element of the change management process, CLEC input should be requested in the change management process. That forum exists and is up and running.

RESPECTFULLY submitted this 10th day of December, 2001.

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COPY of the foregoing hand-
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